

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

IN RE: HAIR RELAXER MARKETING, )	MDL No. 3060
SALES PRACTICES, AND PRODUCTS )	Master Docket Case No. 1:23-cv-00818
LIABILITY LITIGATION )	Honorable Mary M. Rowland
)	)
Gisele Roberts, )	)
)	)
Plaintiff, )	)
)	)
v. )	Civil Action No. 1:23-cv-7903
)	)
)	)
Revlon Consumer Products Corporation; et )	)
al. )	MDL-C Plaintiff ID No. 4695
)	)
Defendants. )	)
)	)

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**PLAINTIFF'S MOTION TO REINSTATE CASE**  
**IN ACCORDANCE WITH CASE MANAGEMENT ORDER NO. 16**

The Plaintiff, by and through her undersigned counsel, moves this Honorable Court to reinstate her claims against all defendants, pursuant to the Court's March 28, 2025 Case Management Order ("CMO 16") [Dkt. 1151]. In support, the Plaintiff states the following:

1. Plaintiff, Gisele Roberts, filed her Short-Form Complaint on September 8, 2023.
2. Plaintiff served her short form complaint via email on November 14, 2023.
3. On February 21, 2025, this court entered a Minute Entry dismissing this case without prejudice, subject to reinstatement pursuant to CMO 16.
4. Since that time, Plaintiff's counsel has successfully regained communication with Plaintiff, and is prepared to submit the Plaintiff Fact Sheet, along with all other requirements of Case Management Order No. 9 within the ten-day timeframe upon reinstatement of this case.

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5. Allowing Plaintiff to reinstate all claims as to all defendants would serve justice and promote judicial efficiency. Further, there would be no substantial or undue prejudice, bad faith, undue delay, or futility.
6. Counsel for Plaintiff will simultaneously alert the previously named Defendants in this case who would be affected by this motion by email.

WHEREFORE, the Plaintiff respectfully requests this Honorable Court grant her Motion to reinstate her case in accordance with Case Management Order No. 16.

Dated: May 8, 2025

Respectfully Submitted,

*/s/ Andrew D. Bluth*  
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*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2025, I filed the foregoing document with the Clerk of Court using the CM/ECF system, which will electronically send notification of such filing to all counsel and parties of record.

/s/ Andrew D. Bluth  
Andrew D. Bluth

*Attorney for Plaintiff*